

1 Marquiz Law Office  
2 Professional Corporation  
◆

3 3088 Via Flaminia Court  
4 Henderson, NV 89052  
Phone: (702) 263-5533  
Fax: (702) 263-5532  
5 Craig A. Marquiz, Esq.  
NV Bar #7437

6 Attorney for Plaintiff  
7

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 ROBERT L. GOLDMAN;

11 Plaintiff,

12 v.

13 VIGILANT INSURANCE COMPANY, a New  
14 York corporation and member of the CHUBB  
GROUP OF INSURANCE COMPANIES;  
DOES 1 through 100, inclusive; and ROE  
15 CORPORATIONS I through 100, inclusive,

16 Defendants.

Case No.: 2:19-cv-2227-JAD-BNW

17 **AMENDED STIPULATION & ORDER  
REGARDING BRIEFING SCHEDULE  
ON VIGILANT INSURANCE  
COMPANY'S MOTION FOR  
SUMMARY JUDGMENT**

(Fourth Request)

ECF Nos. 45, 46

18 Pursuant to LR II 16-1, 26-1 (b), 26-3, and 26-4, and FRCP 16.1 and 26, PLAINTIFF  
19 ROBERT L. GOLDMAN (“Plaintiff”) and DEFENDANT VIGILANT INSURANCE  
COMPANY (“Defendant”) (collectively, the “Parties”), by and through their respective counsel,  
20 hereby stipulate and agree to extend the time for Plaintiff to respond to Vigilant Insurance  
Company’s Motion for Summary Judgment (ECF No. 33). Specifically, Plaintiff shall have  
21 through and including November 15, 2021 with which to file its Opposition brief. The . . .  
22 extension is necessary due to delays associated with Plaintiff counsel’s inability to access his  
23 electronic mail system and files upon returning to the United States earlier this week due to a  
24 changed Microsoft security protocol that occurred while he was abroad on a mission trip, an  
25 . . .  
26 . . .

1 emergency hearing set in a State-court matter on an Order Shortening Time tomorrow  
2 (November 8, 2021) along with an expert deposition to be taken in that matter following the  
3 hearing, and depositions of Plaintiff's geotechnical expert (Bob Thomsen) and general  
4 contracting expert (Randall "Duke" Phelps) on November 10 and 12, 2021, respectively.  
5

6 DATED this 8<sup>th</sup> day of November, 2021.

7 MARQUIZ LAW OFFICE, P.C.

LEWIS BRISBOIS BISGAARD & SMITH LLP

8 By: /s/ Craig A. Marquiz  
9 CRAIG A. MARQUIZ  
10 3088 Via Flaminia Court  
11 Henderson, NV 89052  
12 *Attorney for Plaintiff*

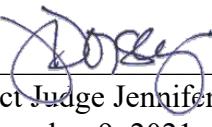
By: /s/ Cheryl A. Grames  
ROBERT W. FREEMAN  
PAMELA L. MCGAHA  
CHERYL A. GRAMES  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
*Attorneys for Defendant*

13 BROENING OBERG WOODS & WILSON P.C.  
14

15 By: /s/ Jason P. Kasting  
16 ROBERT T. SULLIVAN  
17 JASON P. KASTING  
18 2800 North Central Avenue, Suite 1600  
Phoenix, AZ 85004  
*Attorneys for Defendant*

19 **ORDER**

20 Based on the parties' amended stipulation [ECF No. 46] and good cause appearing, IT IS  
21 HEREBY ORDERED that deadline to file the opposition to the motion for summary judgment  
22 [ECF No. 33] is extended to November 15, 2021, and the original stipulation [ECF No. 45] is  
23 DENIED as moot.

24   
25 U.S. District Judge Jennifer A. Dorsey  
26 Dated: November 9, 2021  
27 Nunc pro tunc to November 5, 2021  
28